

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

JANE DOE,

Petitioner-Plaintiff,

v.

Case No. 2:25-cv-00240-CR

U.S. DEPARTMENT OF HOMELAND  
SECURITY; KRISTI NOEM, Secretary of the  
U.S. Department of Homeland Security, in her  
official capacity; THERESA MESSIER,  
Superintendent, Chittenden Regional Correctional  
Facility, in her official capacity; PETE R. FLORES,  
Acting Commissioner, U.S. Customs and Border  
Protection; JULIO CARAVIA, Director, U.S.  
Customs and Border Protection; PAMELA J.  
BONDI, U.S. Attorney General; PAUL  
CAMBELL, Warden, Ouachita Correctional Center;  
KEITH DEVILLE, Warden, Richwood Correctional  
Center,

Respondents-Defendants.

**STIPULATED MOTION TO EXTEND TIME TO RESPOND TO  
PETITIONER'S FIRST AMENDED PETITION (ECF No. 72)**

The Federal Respondents move the Court to extend the time to respond to Plaintiff-Petitioner's May 30, 2025, amended habeas petition and civil complaint until June 27, 2025. In support of this stipulated motion, Federal Respondents submit as follows:

1. On May 14, 2025, this Court conducted a hearing on Federal Respondents' motion to dismiss Plaintiff-Petitioner's original habeas petition and civil complaint (ECF No. 1), which raised claims under the Administrative Procedures Act. At that hearing, this Court took Federal Respondents' motion to dismiss under advisement. ECF No. 48.

2. On May 22, 2025, Plaintiff-Petitioner moved (ECF Nos. 57, 59) for leave to amend her habeas corpus petition and civil complaint, seeking to add five new defendants as parties and raise three claims under the Freedom of Information Act (“FOIA”).

3. At the outset of the May 28, 2025, bail hearing, this Court granted Plaintiff-Petitioner leave to amend her habeas petition and civil complaint and provided Federal Respondents “14 days to supplement [ECF No. 37] Motion to Dismiss.” ECF No. 70 (minute order).

4. On May 30, 2025, Plaintiff-Petitioner filed her first amended petition (ECF No. 72) and requested that the clerk issue summons for service on the newly added parties. ECF Nos. 74-78, 81-85.

5. On May 30, 2025, undersigned counsel contacted a coordinating attorney within the Office of Immigration Litigation to identify an attorney within the Civil Division or appropriate U.S. Attorneys’ Office to address the newly added FOIA claims in this matter and file an appropriate motion or other responsive pleading.

6. Undersigned counsel will be on leave between June 4, 2025, and June 11, 2025.

7. The parties have stipulated to extend the deadline for Federal Respondents to respond to the Court’s order until June 27, 2025.

8. This extension is necessary for Federal Respondents to research and file a motion or other responsive pleading to Petitioner’s May 30, 2025, first amended complaint (ECF No. 72). Petitioner will not be prejudiced by the granting of this motion because this Court released her on bail from immigration detention on May 28, 2025.

9. Counsel for Federal Respondents conferred with counsel for Plaintiff-Petitioner who consents to the relief requested in this motion.

WHEREFORE, Federal Respondents request that the Court grant this motion and extend the deadline to respond to Petitioner-Plaintiff's first amended complaint until June 27, 2025.

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General  
Civil Division

LINDSAY M. VICK  
Senior Litigation Counsel  
Office of Immigration Litigation

/s/ Jeffrey M. Hartman  
JEFFREY M. HARTMAN  
Trial Attorney  
Office of Immigration Litigation  
U.S. Department of Justice  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
(202) 532-4404  
Jeffrey.M.Hartman@usdoj.gov

MICHAEL P. DRESCHER  
Acting United States Attorney

MATTHEW J. GREER  
Assistant United States Attorney  
P.O. Box 570  
Burlington, VT 05402-0570  
(802) 951-6725  
Matthew.Greer@usdoj.gov

Dated: June 2, 2025

*Attorneys for Federal Respondents*